

STEVEN G. KALAR  
Federal Public Defender  
ELLEN V. LEONIDA  
Assistant Federal Public Defender  
450 Golden Gate Avenue, 19th Floor  
San Francisco, CA 94102  
Telephone: (415) 436-7700  
Facsimile: (415) 436-7706  
Email: ellen\_leonida@fd.org

Counsel for Defendant  
MICHAEL HARRIS

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

United States of America,

Plaintiff,

v.

Michael Flynn Harris,

Defendant.

CR 16-483 WHA

Stipulation To Continuance And Exclusion Of  
Time Under The Speedy Trial Act, 18 U.S.C. §  
3161 Et. Seq.; ~~Proposed~~ Order

IT IS HEREBY STIPULATED, by the parties to this action, that the status hearing date of February 7, 2017 at 2:00 p.m. be vacated and the matter re-set for March 7, 2017.

The requested continuance is necessary because defense counsel requires more time to review discovery and conduct investigation. The government has provided over 4000 pages of discovery to date. There is also a related civil action that is voluminous. Defense counsel is unavailable from February 13 to February 20, 2017. The parties agree and stipulate that the time from February 7, 2017 through March 7, 2017 should be excluded, under 18 U.S.C. §3161(h)(7)(A) and 18 U.S.C. §3161(h)(7)(B)(iv) to accommodate counsel's preparation efforts and to afford Mr. Harris continuity of counsel.

1  
2 DATED: February 2, 2017

3 /S/  
4 ELLEN V. LEONIDA  
5 Assistant Federal Public Defender  
6 Counsel for Defendant MICHAEL HARRIS

7 DATED: February 2, 2017


8 /S/  
9 ROBIN HARRIS  
10 Assistant United States Attorney

11 **ORDER**

12 The court finds that the ends of justice served by the granting of the continuance outweigh  
13 the best interests of the public and the defendant in a speedy and public trial. The continuance is  
14 necessary to accommodate counsel's preparation efforts and to afford the defendant continuity of  
15 counsel. Based on these findings, IT IS HEREBY ORDERED THAT the above-captioned matter  
16 is continued to March 7, 2017 at 2:00 p.m., before the Honorable William Alsup. Time is excluded  
17 from February 7, 2017 through March 7, 2017 pursuant to 18 U.S.C. §3161(h)(7)(A) and 18 U.S.C.  
18 §3161(h)(7)(B)(iv).

19 IT IS SO ORDERED.

20 DATED: February 2, 2017.

21   
22 HON. WILLIAM ALSUP  
23 UNITED STATES DISTRICT JUDGE  
24  
25  
26  
27